



May , 2019

Reviewing Officer:

Randy Moore, Regional Forester, USDA Forest Service

Attn: Tahoe National Forest Squaw Valley | Alpine Meadows Base-to-Base Gondola Project
1323 Club Drive
Vallejo, CA 94592

Sent via the Internet to: objections-pacificsouthwest-regional-office@fs.fed.us

Responsible Official:

Eli Ilano, Forest Supervisor, Tahoe National Forest

Re: Statement of Objections to the Tahoe National Forest Squaw Valley | Alpine Meadows Base-to-Base Gondola Project (48417) Draft Record of Decision

Standing Statement:

This objection letter is submitted on behalf of the Tahoe Area Group of the Sierra Club. The Sierra Club, founded in 1892, is a nationwide environmental organization. The Mother Lode Chapter, founded in 1938, implements Sierra Club policies in a large area of Northern California including Placer County. Recently the Mother Lode and Toiyabe (Nevada) Chapters jointly created the Tahoe Area Group to enhance local participation in implementing the Club's policies in and near the Lake Tahoe Basin, including the site of the Base-to-Base Gondola Project.

The Tahoe Area Group of the Sierra Club (Tahoe Area Group) hereby files the following Objection to the U.S. Forest Service's April 2019 draft Record of Decision selecting Alternative 4 for the Squaw Valley | Alpine Meadows Base-to-Base Gondola Project. The Tahoe Area Group participated in the administrative review of the project by filing comments on the Draft EIS/EIR.

This Objection is brought pursuant to 36 CFR 218 (Project).

As required, we provide the lead objector's name, address, telephone number and e-mail address.

Respectfully,

A handwritten signature in dark ink, appearing to read "Laurel Ames".

Laurel Ames, **LEAD OBJECTOR**
Conservation Chair, Tahoe Area Group

I. INTRODUCTION

The Tahoe Area Group submits this Objection to the U.S. Forest Service's April 2019 draft Record of Decision by Tahoe Forest Supervisor Eli Ilano selecting Alternative 4 for the Tahoe National Forest Squaw Valley | Alpine Meadows Base-to-Base Gondola Project. In this Objection, the Tahoe Area Group will describe the aspects of the project being objected to and the reasons for objecting. In addition, the Tahoe Area Group will suggest remedies to resolve the Objection.

The Mother Lode Chapter has provided detailed input on the management of Tahoe National Forest for decades. Some of the issues on which the Chapter has provided input are: timber management, the 1990 Forest Plan, acquisition of checkerboard lands, and wilderness designation. The Chapter played a major role in the 1984 designation of the Granite Chief Wilderness and acquisition of checkerboard lands in the Wilderness, a principal motivation for the Chapter's strong interest in the Base-to-Base Gondola Project. Protecting the remaining private lands inside the Congressionally-designated Wilderness boundary from development, acquiring them, and adding them to the Wilderness is a high priority goal.

II. Statement of Reasons for this Objection

and

III. Suggested Remedies to Resolve the Key Issues of this Objection.

Sections II and III contain statements of reasons for objections to two parts of the decision and suggested remedies resolving these objections. The parts of the decision which we object to are: (1) summer operation of the gondola and (2) construction access routes.

The suggested remedies for resolving each objection are inserted immediately following the statements of reasons.

Summer operations of the gondola

Statement of reasons:

We continue to be concerned about the proposed summer operations of the gondola for maintenance purposes. We originally expressed concern about this proposed summer operation in our comment letter on the DEIR/S, which is reproduced in the FEIR/S, pages 2-172 and 2-175 (all page references are to volume 2). Our comment letter stated that the DEIR/S:

claims that the gondola will not be operated during the summer and that this reduces impacts to SNYLF. The frog is not active during the winter freeze up, and the gondola would not be running when it emerges from its winter torpor as the snow and ice melts off. But as noted previously, the DEIS/R also indicates that the gondola may be used up to ten times during the summer for maintenance and that a limited number of cabins will be on the line for 3-5 days at a time. Ten times a season per cabin plus additional cabins on the line for 3-5 days at a time is not the same thing as no summer operation, and the obvious concern is that this level of usage could have detrimental impacts on the behavior of the SNYLF (FEIR/S, page 2-172).

The DEIR/S did not analyze the impact of summer maintenance operation of the gondola on the SNYLF and other wildlife, relying on the assertion that there would be no summer operation as an excuse for this oversight. The response to comments in the FEIR/S provided the clarification that the gondola cars would not be run all day long, but rather “only during short periods of activity during the day (FEIR/S, page 2-173).” As well, the response to comments makes the argument that the noise impacts of operation were “noted in the discussion of operational noise impacts on page 4.9-22 of the Draft EIS/EIR (FEIR/S, page 2-174).” The response also stated that: “noise levels between towers would be minimal and would not increase ambient noise levels over existing conditions (FEIR/S, page 2-174),” and that the base terminals where more noise would be generated “are far from any locations where SNYLF would be expected to be found (FEIR/S, page 2-175).” The report then concluded that “the further consideration of summertime gondola maintenance activities does not alter the analysis or conclusions in the EIS/EIR related to potential impacts to SNYLF (FEIR/S, page 2-174).”

As we emphasized in our DEIR/S comment, the DEIR/S ignored the planned summer maintenance operations and therefore incorrectly concluded that the impacts of summer usage on the SNYLF need not be analyzed.

Our concern was that this unanalyzed usage would potentially impact SNYLF. Possible noise impacts were mentioned in our DEIR comment, but only as an example of possible impacts and not as the only possible impact. The response to comments in the FEIR/S addresses noise impacts but concludes that they would be insignificant, because the operating gondola is quiet except at the towers and the terminals are far from SNYLF locations. This response did not consider possible impacts on dispersing frogs or frogs moving to new locations. It also did not consider the possibility of any other potential impacts posed by gondola operation during the summer when the frogs and other wildlife are active – for example, shadows cast on the ground as gondola cars passed overhead and noise from workers riding on the chairs - only two of the many possibilities.

The responses to comments in the FEIR/S did not cite any evidence showing that summertime operation would not be detrimental to the SNYLF and other wildlife. This response significantly increased our original concern that the summer operation of the gondola could be a significant problem for the SNYLF and other wildlife if it were not strictly limited.

The use permit for the gondola should acknowledge the possible wildlife impacts of summer operation and include safeguards to minimize and avoid those impacts, for example no operation during dispersal periods for the SNYLF.

When to shut the gondola down in the spring? SNYLF impacts to consider

Specifying the starting time for ski season operation of the gondola appears to be straightforward. When it is cold enough and there is enough snow for skiing at both resorts, SNYLF are already in overwintering sites. Specifying the spring shutdown date is quite a bit trickier, though, and the predicted future impacts of climate change will make it even trickier. Specifying a fixed date based on some function of snow depths observed in recent years would not necessarily sufficiently protect the frogs. Climate change models consistently predict future decreases in snowfall and shortenings of winters. Spring shutdown dates based on both resorts being open for skiing are potentially equally tricky. Snowmaking may be producing adequate snow for skiing at both resorts, but areas under the gondola alignment are unlikely sites for snowmaking and might not be snow-covered.

The resorts might invest in snowmaking capacity enabling them to continue operating in future years with shorter winters and low snowfall while there is limited natural snow cover on slopes under and near the gondola alignment. The Five Lakes Trail might become passable very early in the spring while both resorts are still operating. To reduce visual impacts on the Five Lakes Trail, relating the spring shutdown date to snowpack conditions in areas without snowmaking may be more appropriate than relating the date to both resorts being open for skiing.

Suggested Remedy: The use permit for the gondola should acknowledge the possible wildlife impacts of summer operation and include safeguards to minimize and avoid those impacts, for example no operation during dispersal periods for the SNYLF.

We propose requiring that the gondola be shut down before the frogs emerge from winter torpor as a remedy protecting the SNYLF. This remedy would also likely resolve our concern about reducing visual impacts on the Five Lakes Trail.

Construction Access Routes

Statement of Reasons

Potential environmental impacts to vegetation, soils, etc., are documented in the FEIS/EIR; the RPM's give directions for assessing impacts and mitigating them. However, the description of construction methods and decisions in section 2 of the FEIS/EIR is exceedingly general, merely listing all the possibilities. All details are deferred to the subsequent Route Plan. Comments on the general description in the DEIS/EIR would not have been responded to substantively. Dr. Michael White submitted comments on behalf of Sierra Watch stating that details of methods and decisions should have been discussed; the response asserted that discussing details of construction methods and decisions in a DEIS/EIR is premature.

The impacts of construction methods and decisions must be adequately documented in the Route Plan, including impacts specific to Tower Zones. This documentation must be available to the public. The Sierra Club is particularly concerned about construction methods and decisions for new construction access routes.

The design decisions for new construction access routes that should be documented include:

- justifications for accessing segments of the alignment by a surface route instead of by helicopter;
- topographic constraints on constructing surface routes, such as limits on the steepness of the route and on the steepness of slopes the route traverses;
- construction methods;
- disposal of construction debris (disposal methods and locations for the much smaller amount of debris from tower excavations are specified);
- what sizes of trucks and what types of construction equipment the route will be suitable for;
- restoration methods and standards, if the route is to be restored.

Impacts of segments of the alignment where roads and other developments are not nearby, such as segments in Tower Zone B close to the congressionally-designated GCW, are of particular concern. Part of the route accessing this segment will be newly constructed.

The initial segment of this route, beginning at the Alpine Meadows midstation, is an existing road. Judging by Google Earth views, it is a native-surface low-standard road. A short segment of this road lies within the Congressionally-designated Granite Chief Wilderness. This segment should be modified to the minimum extent possible and restored to its pre-project condition after construction is completed.

Exhibit ROD-1 does not clearly display the extent of new construction access route next to the alignment in Tower Zone B, but the route appears to extend almost to the Five Lakes Trail.

Terminating the route far enough south that it is not in the foreground view from the Trail would significantly enhance the visual quality experienced by hikers on the Trail.

The Alternative 4 view from viewpoint 10 shows a tentative tower location very close to the Five Lakes Trail. A more distant location would enhance the visual quality experienced by hikers.

Suggested remedy: modify the selected alternative and/or the Record of Decision to specify that the Route Plan must include the environmental documentation and satisfy the environmental constraints specified above and that the Route Plan must be publicly available.

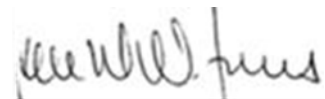
REQUEST FOR RELIEF

The Tahoe Area Group requests that the Responsible Officer be directed to implement the suggested remedies.

CONCLUSION

The Tahoe Area Group looks forward to discussing appropriate resolutions to points raised in this objection with the reviewing officer. We ask to be informed in writing of any responses to these objections or of any further opportunities to comment on the decision.

Respectfully,

A handwritten signature in dark ink, appearing to read "Laurel Ames", is written over a faint, light-colored rectangular stamp.

Laurel Ames, Conservation Chair
Tahoe Area Group of the Sierra Club